Case: 4:24-cv-00632-SPM Doc. #: 50 Filed: 08/25/25 Page: 1 of 3 PageID #: 166

## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

| VICTOR MANUEL RIBAS, | ) |                        |
|----------------------|---|------------------------|
| Plaintiff,           | ) |                        |
| v.                   | ) | Case No. 4:24-cv-00632 |
| MEGAN BESLER,        | ) |                        |
| Defendant.           | ) |                        |

## <u>DEFENDANT'S MEMORANDUM IN RESPONSE</u> <u>TO THE COURT'S AUGUST 19, 2025 ORDER</u>

COMES NOW Defendant Megan Besler, by and through her undersigned counsel, and states as follows:

- 1. Defendant does not consent to re-engaging with the mediator to resolve the disputes herein, and instead, elects to file a motion seeking other relief from the Court.
  - 2. Defendant seeks to file a Motion for Miscellaneous Relief and/or Sanctions.
- 3. Defendant respectfully requests an additional 14 days to file a Motion for Miscellaneous Relief and/or Sanctions and in compliance with this Court's Order dated August 19, 2025 (Doc. 49).
- 4. This request is not meant for delay and no prejudice will result from granting this additional time.

WHEREFORE, Defendant respectfully requests an additional 14 days to file her motion for Miscellaneous Relief and/or Sanctions in compliance with this Court's Order (Doc. 49), up to and including **September 8, 2025**.

Case: 4:24-cv-00632-SPM Doc. #: 50 Filed: 08/25/25 Page: 2 of 3 PageID #: 167

Dated: August 25, 2025 Respectfully submitted,

KEANE LAW LLC

By: /s/ Ryan A. Keane

Ryan A. Keane, #62112MO 7711 Bonhomme Ave, Suite 600

St. Louis, MO 63105 Phone: (314) 391-4700 Fax: (314) 244-3778 ryan@keanelawllc.com

Attorney for Defendant Besler

## **CERTIFICATE OF SERVICE**

I hereby certify that on August 25, 2025, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to the attorneys of record.

/s/ Ryan A. Keane